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NAVAL WAR COLLEGE Newport, R.I.

HOMELAND DEFENSE AND RESPONSE TO WEAPONS OF MASS DESTRUCTION: ARE NATIONAL GUARD CIVIL SUPPORT TEAMS A NECESSARY ASSET OR DUPLICATION OF EFFORT?

by

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The contents of this paper reflect my own personal views and are not necessarily endorsed by the Naval War College or the Department of the Navy.

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Abstract of

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The 1995 Oklahoma City bombing maximized America's awareness of its vulnerability to terrorist activities, and erased the nation's sense of security that terrorist attacks could not occur within the United States. As a result, the possibility of such bombings, to include weapons of mass destruction (WMD), could no longer be ignored. In May 1998, the President issued Presidential Decision Directive (PDD) 62, which established policy and assigned responsibilities for responding to homeland attacks. It directed the Department of Justice (FBI) to assume the lead for such circumstances and it also identified the National Guard as playing an important role in this program. The National Guard established Civil Support Teams in each of the ten FEMA regions to assist state and local first responders in a WMD incident. In May 1999, a US General Accounting Office report on federal government efforts to combat terrorism indicated that the role of National Guard Civil Support Teams remained unclear and there is significant redundancy in response capabilities. This paper examines whether there is a continued need for the National Guard Civil Support Teams, and explains how they fit into Federal, State, and local response plans.

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INTRODUCTION

On February 26, 1993, a terrorist detonated a car bomb at the World Trade Center in New York City. The results of the blast were six killed and more than 1,000 wounded. A little known fact regarding this explosion was the Federal Bureau of Investigation found residue of sodium cyanide at the site. Fortunately for the citizens of New York City, the terrorists failed to completely detonate the bomb. If the blast had been completely successful, the death toll would have been much higher.

In March 1995, a Japanese religious cult known as Aum Shinrikyo successfully executed a Sarin gas attack within the Tokyo subway system during the peak commuter period. In this terrorist attack, twelve people were killed and over 5,000 were wounded. This incident quickly heightened America's awareness to the vulnerability of a similar attack occurring within the United States. Approximately one month after the Tokyo subway attack, Timothy McVeigh detonated a truck bomb in front of the Murrah Federal Building in Oklahoma City, Oklahoma. This horrific blast killed 168 people and injured more than 500.² The results of this devastating attack will be forever ingrained in the hearts and minds of the American people. It is difficult today to find an American adult who does not remember the tremendous destruction caused by the blast, which reduced the former Federal Building to a pile of rubble in an instant.

The Oklahoma City bombing maximized America's awareness of its vulnerability to terrorist activities, and erased the nation's sense of security that terrorist attacks could not occur within the United States. As a result, the possibility of such bombings, to include

² Ibid., 3.

¹ Robert L. Finn, LTC, "The National Guard's Role in a Weapons of Mass Destruction Incident," Strategy Research Project, US Army War College (Carlisle, PA: 1999), 2.

weapons of mass destruction (WMD), could no longer be ignored. In response to the populace fears of terrorism, the President issued Presidential Decision Directive (PDD) 62 in May 1998. It established the Administration's policy and assigned responsibilities for responding to homeland attacks. It directed the Department of Justice (FBI) to assume the lead role for such circumstances. Additionally, the Administration created the Domestic Terrorism Program, under which the Department of Defense (DoD) is to provide military units as augmentation forces for response to WMD attacks. These units are also to assist local emergency response teams with training and simulation exercises. The National Guard was identified as playing an important role in this program.³

In response to the above tasking, DoD initiated the training of Army National Guard units from ten states. The WMD response Guard units, originally known as Rapid Assessment and Initial Detection (RAID) Teams, have been recently re-designated Civil Support Teams (CST). However, it appears that the role and future need of the CSTs are undefined. The US General Accounting Office (GAO) indicated there are differing views among federal, state, and local officials on the necessity for these teams. A May 1999 GAO report on federal government efforts to combat terrorism indicated that the role of CSTs remains "unclear," and there is significant redundancy in response capabilities. Specifically, the FBI and FEMA, along with some state and local officials, think the CSTs provide a service that is already available by other means.⁴

This paper argues that there is a continued need for the National Guard Civil Support Teams, and explains specifically how they fit into Federal, State, and local response plans.

³ William J. Clinton, <u>A National Security Strategy for a New Century</u> (Washington DC: The White House, October 1998), 12.

⁴ US General Accounting Office, <u>COMBATING TERRORISM</u>: Use of National Guard Response Teams is <u>Unclear</u> (Washington DC, May 1999), 20.

This thesis will be supported using the following methodology. First, the strengths and advantages of CSTs are examined. Second, CST disadvantages are analyzed. Third, advantages and disadvantages are contrasted and weighed. And fourth, a thesis-supporting conclusion, to include recommendations, is presented.

ARE NATIONAL GUARD CIVIL SUPPORT TEAMS A VITAL ASSET?

The National Guard CSTs are expected to play a critical role in immediate, domestic response to WMD employment within the United States. As of January 2000, there are ten teams strategically placed throughout the United States. Each team is planned to be fully equipped, trained, and certified by spring 2000.⁵ These initial ten teams have been allocated one to each of the ten Federal Emergency Management Agency (FEMA) regions. The main purpose for this allocation is to provide local first responders in each region the additional capability to rapidly detect chemical and biological agents, and assist in mitigating the aftereffects of a domestic WMD incident. Additionally, the CSTs are to serve as the "tip of the military response spear," facilitating the coordination between State and local first responders, DoD scientific experts, and any other military or Federal assets deemed necessary.⁶ While CSTs are federally funded, it is also essential to highlight that they exist as state assets until the President federalizes the units.

On January 13, 2000, the principal deputy assistant secretary of Defense for Reserve Affairs, Mr. Charles Cragin, announced that an additional seventeen CSTs were being funded. This will bring the total CST number to twenty-seven. He noted that the placement

⁵ Linda D. Kozaryn, "DoD Helps Hometown USA Confront Terrorism," available from http://www.defenselink.mil/news/Jan2000/b01132000 bt017-00.html>; Internet; accessed 11 April 00. ⁶ GAO, 30.

of the additional teams is to be based on a detailed study to optimize population and geographical coverage, while also minimizing the overlap between the teams' areas of responsibility. This will provide teams in a total of 26 states, where California is scheduled to receive two teams because of its significant geographical size and population. As with the original ten teams, it will be approximately fifteen months before the new teams complete the necessary individual and team training, and are certified by the Secretary of Defense.

Each CST comprises twenty-two members who are Active Guard and Reserve (AGR), which means they are Title 10 active duty Guardsmen. Members fill these AGR positions from either the Air or Army National Guard, which allows for the greatest flexibility in obtaining the most qualified individuals. Thus, the CSTs are manned by AGR (active-duty) Guardsmen, who provide the capability of rapidly responding to an incident within four hours, 24 hours a day, 7 days a week, 52 weeks a year. Additionally, since this is their full-time Guard responsibility, the team members can train and work with state and local "first responders" on a daily basis to maintain proficiency and readiness.

In addition to the 27 standard CSTs, 44 CST (Light) teams are being created. Congress authorized this on October 21, 1998, to afford all 54 states and territories a limited ability to respond to WMD incidents. These Light teams are designed and equipped based on the full-time CST organization. However, the main difference is traditional (part-time) Guardsmen will man the teams. This allows the CST (Light) team to be an asset available should the Governor declare a state of emergency and activate the National Guard. The training for these team members is identical for all members of CST elements, and thus provides a

⁷ DefenseLINK News, "DoD News Briefing," available from

http://www.fas.org/spp/starwars/program/news00/t01132000_t0113asd.htm; Internet accessed 14 April 00.

resource for filling vacancies that may occur in the full-time CSTs. Such cross-training will ensure the 27 CSTs continue to meet their availability requirements.

A crucial CST component comprises several pieces of highly sophisticated equipment. The first is a mobile analysis laboratory, which the teams convey to the WMD incident site. This lab is used specifically for identifying chemical or biological agents in the field, which greatly enhances the ability of the first responders to assess quickly the nature of the incident. Prior to the development of the original RAID Teams, this was a crucial need identified by first responders in many communities around the nation because it exceeded their existing technical capability in the event of a WMD attack.

CSTs also possess another vital piece of equipment, the uniform command suite. This is a command and control system that provides complete communications interoperability through multiplexing systems among the various elements responding to a WMD incident. In other words, this equipment allows an integrated communications link between local, state, and -- in the case of a Federally declared emergency -- Federal response elements. As in any disaster situation, communications among response elements becomes a critical problem because of the differences in communications equipment. The CSTs are capable of bridging this communications gap.

CSTs are an extremely valuable asset to states and local communities because of the unique federal-state relationship they possess. Each team is federally resourced and trained, but remains under the control of the state governor, specifically under the operational control of the state adjutant general. This permits immediate access to a CST without going through

⁸ GAO, 36-37.

⁹ DefenseLINK News, "DoD News Briefing".

¹⁰ Thid

the complex and tedious process of requesting federal assistance.¹¹ Essentially, this is no different than for any other National Guard unit, except CSTs become closely linked to the states and local communities, much more so than a traditional Guard unit, which only works with state and local officials under a state declared emergency. As noted above, CSTs can train and work closely with local first responders to provide education on capabilities, limitations, and equipment available for a WMD incident.

A final point to note is although there are only 10 teams currently operational and an additional 17 in the near future, many states and US territories will not have a full-time CST. However, this is not seen as a critical issue because many states have implemented a mutual assistance compact. This compact allows for the sharing of resources such as National Guard assets. In fact, many states have already exercised this compact during emergencies that have exceeded their capabilities, such as the devastating 1999 hurricane in North Carolina. This exchange of assets also has been done among states that are not part of the agreement.

In summary, there will be a total of 27 (full-time) CSTs located in 26 states, with 44 additional CST (Light) teams (part-time) in each of the remaining states and territories. These teams are federally funded and trained, and will remain a state controlled asset unless federalized by the President. The CSTs provide local first responders the additional capability to rapidly detect chemical or biological agents, and assist in mitigating the aftereffects of a WMD incident. Also, with the CST uniform command suite, the incident commander has the ability to communicate and coordinate with all state, local, and Federal responders. Therefore, the National Guard CSTs play a critical role in the response to a WMD incident and are a vital asset to state and local officials.

¹¹ Ibid.

ARE CIVIL SUPPORT TEAMS AN UNNESSASSARY DUPLICATION OF ASSETS?

There are divergent views regarding the necessity for the Civil Support Teams (CSTs). A May 1999 US General Accounting Office report has articulated many of these concerns. To begin, the GAO report notes there are differing views relative to the role and use of the RAID (CST) teams and how they fit into the state and federal response plans. The Army believes the teams provide a valuable capability to federal authorities, while officials from the FBI and FEMA feel the teams are a duplication of effort, and are concerned how the CST concept fits into a WMD response plan.¹²

The FBI sees a conflict between the CST and the FBI's Hazardous Materials Response Unit (HMRU) if they are both on the scene attempting to give advice to the incident commander. The FBI also sees a duplication of effort between the CSTs and local or state Hazardous Materials (HAZMAT) teams. More importantly, FBI officials think if an incident commander suspects WMD and determines there is a need for further information or assistance, they have direct access to either the National Response System hotline or the Chemical and Biological Hotline created by the US Army to report or confirm WMD incidents. The Chemical and Biological Hotline links the caller with the Army's Soldier and Biological Chemical Command for advice. Therefore, according to the FBI, the CSTs are a duplication of Federal assets.

The GAO reports that most of the state and local officials they contacted do not conceive a CST role in their response plans. Utah officials indicated that should a WMD event occur, they would use the Army's Technical Escort Unit (TEU) stationed in Utah because they have already established a response relationship. The TEU provides DoD and other Federal

¹² GAO, 7.

¹³ Ibid., 7-8.

agencies immediate worldwide response capability for chemical and biological warfare. For domestic response, the TEU deploys as lead elements of the Chemical/Biological Rapid Response Team to provide assistance to state and local communities.¹⁴ Therefore, Utah officials do not believe the CST would be of any value.

Similarly, officials from the Virginia Department of Emergency Services do not believe the CST would arrive in time to be of any benefit. The thirteen existing HAZMAT teams around the state, all capable of performing detection and identification, could respond to a WMD incident and provide assistance to the incident commander. Virginia officials also expressed concern about how the CST would interact with their HAZMAT teams and what assistance they could provide if they arrive too late.¹⁵

This leads to another concern expressed in the GAO report. There are over 600 HAZMAT teams in the United States that possess capabilities similar to the CSTs. There are also federal, military, and civilian assets available to assist first responders. For example, the Air National Guard has assets within their civil engineering units that are equipped to deal with a WMD incident. They are capable of identifying chemical agents and radioactivity, controlling contamination, and providing decontamination support. Other military assets also available are the previously mentioned Army TEU, the Marine Corps' Chemical/Biological Incident Response Force (CBIRF) at Camp Lejeune, North Carolina, and other Army medical research and analytical response elements. ¹⁶ Each of these units can detect, identify, and assist in mitigating the effects of a WMD incident. Therefore, there is a duplication of capability with the CSTs.

¹⁴ US Army Technical Escort Unit, available from http://teu.sbccom.army.mil/factsheet.htm; Internet accessed 7 May 00.

¹⁵ Ibid., 9.

¹⁶ Ibid., 13.

In addition to the DoD assets available to state and local first responders, there are other federal agencies that could render the same assistance provided by the CSTs. For example, both the Environmental Protection Agency (EPA) and the US Coast Guard possess the capability to respond to radiological substance and hazardous material incidents. EPA HAZMAT teams also have the capability to respond and work within "hot zone" areas. The EPA has 12 labs able to provide analytical support and field monitoring. Five of these labs are mobile and capable of providing chemical and biological analysis.¹⁷

Because the CSTs are mission-tasked to be on-call 24 hours a day, there is concern they will be unable to maintain this capability because of recruiting and retention problems. This is particularly worrisome because the CSTs require highly trained individuals to fill all positions. Also, because of limited potential for promotion and the fact these highly trained team members are a valuable asset in the civilian sector, there will be a significant problem with retention. All these constitute a critical issue because of the need to maintain the unit at 100 percent strength in order for it to be of value to state and local first responders. ¹⁸

Another potential problem may be that the CSTs will have significant difficulty maintaining proficiency once certified. State and local HAZMAT officials have noted that the skills necessary to operate the complex equipment and function as a team are degradable, and proficiency will diminish unless constantly utilized. Many of these officials also noted they would not keep some of the CST sophisticated equipment in their inventory because of its complexity and the unforgiving requirement for highly skilled individuals to calibrate and maintain it.¹⁹

¹⁷ Ibid., 15.

¹⁸ Ibid., 17.

¹⁹ Thid 19

One of the biggest CST concerns is their ability to respond to an incident in a timely manner. Their mission profile requires that they be at a response site within four hours. State and local officials indicated that for the incident commander to benefit from CST presence, the team must arrive within the first one to two hours. Beyond that, the local HAZMAT teams could have determined the nature of the incident and mitigation efforts would have begun. Therefore, the incident commander would have control of the situation and would not require any additional assistance the CSTs could provide.²⁰

Because the CSTs have no dedicated air transportation, their ability to respond within four hours may be compromised. Conversely, the FBI Hazardous Materials Response Unit has ready access to dedicated aircraft and flight crews. This gives it capability to respond almost as soon as notified. With respect to the CSTs, if a WMD incident site is not close by, the probability that the team can arrive in a timely manner and provide any substantial assistance to the incident commander will be diminished.²¹

There are significantly different perspectives regarding the role and mission of the newly formed Civil Support Teams. Both the FBI and FEMA, which are the lead elements for the federal response to a domestic WMD incident, indicated the CSTs are an unnecessary element in the response plan. They noted the CSTs possess capabilities that currently exist in many of the state and local first responder HAZMAT teams. Also, it appears the capabilities of the local and state teams were not considered prior to implementing the CSTs. Therefore, the CSTs appear to be an unnecessary duplication of capability and thus eligible for elimination.

²⁰ GAO, 18.

²¹ Oliver L. Norrell, III, LTC, "The Rapid Assessment and Initial Detection (RAID) Program," Strategy Research Project, US Army War College (Carlisle, PA: 1999), 14.

ANALYTICAL CONTRAST

In order to determine whether the National Guard CSTs are a vital asset or a duplication of capability as the GAO indicates, it is prudent to first identify exactly what their role is. According to the National Defense Panel (NDP), managing the consequences of a WMD incident will require action from all levels of government, and DoD must be prepared to provide assistance to first responders. The NDP further recommends that the National Guard and the Army Reserve be prepared to:

- Train local authorities in chemical and biological weapons detection, defense, and decontamination;
- Assist in casualty treatment and evacuation;
- Quarantine, if necessary, affected areas and people; and
- Assist in restoration of infrastructure and services.²²

Responding to the NDP report and PDD 62, DoD recognized the National Guard's role in this effort and initiated training WMD units. These units are specifically designed to support local first responders for a WMD incident and to:

- Conduct a comprehensive assessment of the situation,
- Advise the Incident Commander on appropriate response measures, and
- Facilitate access to any required follow-on military response assets.²³

DoD clearly recognized that, according to state, local and Federal response plans, the National Guard would be activated by the State's governor and arrive "on-scene" prior to any other Federal agencies, and more specifically, prior to any other DoD asset. Therefore, the National Guard CSTs were created and trained to provide first responder assistance and serve as the "tip of the military spear," as previously mentioned. Furthermore, the National Guard, especially in the states with CSTs, has articulated CST capabilities and roles to Federal,

²² National Defense Panel, <u>Transforming Defense</u>: <u>National Security in the 21st Century</u>, <u>Report of the National Defense Panel</u>, (Arlington, VA: December 1997), 26.

²³ GAO, 30.

State, and local officials.²⁴ In fact, DoD has specifically placed the initial ten teams within each of the ten FEMA regions to provide direct assistance in the Federal coordination effort. Consequently, it seems that the GAO claim that the role of the National Guard CSTs is "unclear" is invalid.

Evaluating the GAO and FBI claim that the CSTs are redundant because there are existing HAZMAT teams throughout the country that perform the same functions, may be valid to a certain degree. However, the DoD response to the GAO report clearly articulates that the CSTs, the Army's Chemical-Biological Rapid Response Team, and the Marine Corps CBIRF are the only organizations specifically designed to provide a multi-disciplined response capability to domestic WMD incidents.²⁵

Additionally, in 1998, Secretary Cohen directed DoD to develop the CST program because many local "first responders" noted they lacked the capability and technical expertise to identify and evaluate certain chemical and biological agents that might be used in terrorist attacks. Furthermore, while the FBI's HMRU may possess capabilities similar to the CSTs, its primary mission is law enforcement. The HMRU, unlike the CSTs, was not developed to provide command and control, medical, and logistical assistance to the incident commanders. When comparing CST capabilities to state and local HAZMAT teams and other Federal assets, there is some redundancy, but the CSTs also offer identification and evaluation resources not otherwise available to the incident commander.

As discussed in the preceding section, officials from Utah and Virginia indicated they saw no need for the CSTs because of a perceived duplication of effort. Utah noted it had an

²⁵ Ibid., 34

²⁴ Ibid.

²⁶ DefenseLINK News, "DoD News Briefing".

agreement with the Army's TEU and did not need CST support. Virginia officials believe the CSTs would not arrive in a timely fashion and their existing HAZMAT teams would respond. This seems to be somewhat in conflict with the fact that both Utah and Virginia, along with many other states, have expressed an interest in creating a CST. In Utah's case, this request may have possibly been submitted to obtain additional National Guard force structure, and not necessarily in response to a specific need for WMD response assets. However, this certainly does not seem to be the case in Virginia, where Governor Jim Gilmore, currently the chairman of a new 20-member advisory panel charged with assessing the US ability to deal with a WMD incident, is advocating a key role for the Guard's ten new CSTs.²⁷ As a result, DoD, the National Guard Bureau, and requesting states must further compare requirements to existing state, DoD, and other Federal capabilities to ensure there will be no duplication of effort before designating a state for fielding a CST.

Evaluating the CST recruiting and retention question raised by the GAO is an intriguing issue. First, that fact the GAO raises the question of recruiting and retention as a reason not to field the CSTs leads one to believe recruiting and retention should dictate force structure, but not the mission requirements. The US military is currently faced with recruiting and retention problems. However, the United States cannot afford to establish the size of its military force based on an estimated ability to recruit and retain.

Second, according to DoD, maintaining the full-time AGR strength of the Army National Guard has not been, nor is expected to be, a problem in the future.²⁸ In fact, as previously noted, the 22-member CST (AGR) teams are filled with personnel from both the Army and

²⁷ Bob Haskell, SGT. "Guard WMD Teams have fan in Virginia Governor," <u>National Guard</u>, September 1999, 24-25.

²⁸ GAO, 36.

Air National Guard, which provides for the greatest resource of highly qualified individuals. It should also be noted the AGR positions within the National Guard are considered premier because they are stable, active duty assignments with all of the pay and benefits afforded to Title 10 active duty personnel. Furthermore, the additional 44 Light CSTs being fielded in the US states and territories will also provide an excellent resource to fill any vacancies within the CSTs. In retrospect, recruiting and retention challenges do not appear to be valid reasons for not funding and fielding a force if there is an important and legitimate mission.

As previously noted, it takes approximately 15 months to complete both individual and collective training prior to a CST being certified. This is by virtue of the nature and complexity of the mission. Therefore, it appears that the issue of sustained proficiency training is a valid concern. As with any complex assignment, maintaining a unit's proficiency will be a difficult task. It is apparent that much has gone into the critical initial training, but further detailed plans must be developed to sustain the team's response capabilities. According to the GAO report, the State of Pennsylvania was responding to this issue by looking into creating "on-the-job opportunities" such as working closely with local HAZMAT teams in day-to-day training events, and also integrating the CST into larger scale local or regional training exercises.²⁹ This will accomplish two things. First, it will keep the unit proficiency high, and second, it will educate the state and local authorities in CST capabilities. Based on this evaluation, it is apparent that maintaining the CST proficiency is a reasonable concern, but again it is not a reason to justify eliminating the CST altogether. However, it is of critical importance that DoD and especially the Army National Guard

²⁹ Ibid., 18.

address this issue in detail, because the initial 10 teams will soon be fielded and certified.

The final element evaluated to determine if the CSTs are an asset or merely a duplication of effort was the concern raised regarding response timeliness. The 22-member full-time CST is on-call 24-hours a day and can operate within a 150-mile radius.³⁰ State and local officials stated that in order for the CST to be of any value, it must arrive within 1-2 hours. Based on the team's mission and its radius of operation, it seems that the 1-2 hour response time is unrealistic. However, the four-hour goal established for the CST seems to be more realistic considering its stated mission of providing first responder assistance and acting as the "tip of the military spear." Because any incident involving WMD use will receive the utmost attention of state and Federal officials, it will be essential that the CSTs arrive on-site as soon as possible. The critical question is how soon? Obviously, the sooner the better, but it is unrealistic to expect these teams to arrive, in all instances, with the first responders. This issue will and should remain a concern, yet it does not constitute a valid reason to terminate the concept of providing local first responders with federally funded support controlled at State level.

SUMMARY AND CONCLUSION

In this paper, the advantages and disadvantages of the Civil Support Teams have been presented along with an analysis of the key points for each argument. The May 1999 GAO report concluded that the role of the CSTs was "unclear" from the Federal, state, and local perspectives. It also concluded the CSTs had capabilities similar to those found at the

³⁰ Chris Maddaloni, "Homeland Defense: National Guard 'RAID' teams ready to take point on US military's response to use of weapons of mass destruction," <u>National Guard</u>, January 2000, 25.

³¹ Finn, 14.

Federal, state, and local levels, thus offering an unnecessary duplication of effort. The GAO report also indicated that the continued need for CSTs should be reassessed by cognizant Federal agencies to determine whether they are a necessary element in WMD emergency response plans. If it is determined that CSTs are not necessary, they should be eliminated altogether.

The evaluation of key issues presented in this paper indicates that the GAO, the FBI, and FEMA may be misinformed as to National Guard CST role and how they are intended to function in overall US emergency response plans. These teams are Federally trained and funded, but remain a state (National Guard) asset specifically intended to bridge the gap between local and state first responders and follow-on Federal assets. However, also appears the responsibility clearly rests with DoD and National Guard officials to rectify this misconception and educate all agencies involved in emergency response, from the local to the Federal level.

With respect to the issue regarding similar capabilities between existing Federal and local assets and the CSTs, there are some redundant capabilities. However, the CSTs possess the resources that enable local first responders to detect both chemical and biological agents, which local officials had originally determined to be a shortcoming. They also provide the incident commander the ability to communicate and coordinate more effectively with other follow-on agencies such as the FBI, FEMA, and others. They are also capable of providing medical and logistical assistance, which in a WMD incident could quickly exceed the capabilities of the local responders. Whereas redundancy in capabilities may occur at different levels in the total response plan, they actually complement and augment one another.

The issue regarding CST recruiting and retention problems was argued to be an invalid reason to question their existence and future Federal funding. However, the more critical issues were determined to be their ability to maintain long-term proficiency and timeliness of response to a WMD incident. The ability of the CSTs to maintain their proficiency will continue to be an issue in the future, but it is not an insurmountable problem. National Guard officials and CST commanders should develop plans to work and train with state and local first responders. This would allow them to educate state and local officials, while simultaneously training and maintaining proficiency.

Furthermore, continuous training at the state and local level will optimize response times. The more the CSTs train with first responders, the more proficient they will become, allowing them to further develop operational procedures which are best suited for their area of expertise and responsibility.

In conclusion, the evaluation of the advantages and disadvantages of the CSTs indicates that there are no legitimate reasons presented to eliminate the teams. These teams are designed to provide critical assistance to the incident commander, which ranges from communications and detection to medical and logistical support. These teams are Federally funded, yet remain an asset to the state and local emergency response elements at no additional cost to the communities. Therefore, the National Guard Civil Support Teams are a valuable and viable asset to their states, and should continue to be funded and integrated into the US response plans for WMD incidents.

RECOMMENDATIONS

The National Guard will continue to be a valuable asset in the future. This includes playing a greater role in both the Federal and local emergency response plans for a WMD incident and Homeland Defense. Based on this paper's analysis concerning the future of the National Guard Civil Support Teams, the following recommendations are presented for consideration. These recommendations are not presented in any particular order of precedence because each is considered equally important.

• Funding and fielding the approved 27 CSTs, along with the 44 (Light) CSTs, should continue as proposed.

The CSTs present the states and local communities with a valuable asset at their direct disposal without the requirement of going through the time-consuming and complex process of requesting Federal assistance.

 DoD and the National Guard Bureau (NGB) must further clarify the exact role and capabilities of the CSTs to all Federal agencies.

The most significant reason that GAO questioned the future of the CSTs is because GAO, along with the FBI and FEMA, were unaware of exactly what role the CSTs would assume in a WMD incident. More importantly, DoD and NGB must ensure that all Federal agencies are aware that while the CSTs are a Federally funded asset, they are not part of the Federal Response Plan; they are a Guard asset directly available to the States.

• The Adjutant General (AG) from each of the states where CSTs are placed must ensure that the teams are fully integrated into state WMD emergency response plans.

The AG must be the primary individual charged with ensuring that all state and local officials are educated in CST capabilities and limitations. AGs must also ensure that these teams are fully integrated into the state emergency response plans.

 CST Commanders must develop training plans that include working and training with local HAZMAT teams.

Working and training with local officials will not only educate those unfamiliar with the CSTs, but will also enhance the proficiency of the team members themselves.

 CST Commanders must ensure that their teams are training with associated Light Teams in neighboring states.

The full-time CSTs should be working with neighboring Light Teams during their monthly training assemblies. This will ensure standardization in training and procedures, which will enhance the capabilities and proficiency of both teams.

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